

Appl. No. 09/998,386  
Appeal brief dated 07/03/2007  
Reply to Office Action of 02/07/2007

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re: Application of:	:	
Brown et al.	:	
Serial No: 09/998,386	:	Before the Examiner:
		Maikhanh Nguyen
Filed: 11/15/2001	:	Group Art Unit: 2176
Title: APPARATUS AND METHOD	:	Confirmation No.: 7328
OF HIGHLIGHTING LINKS IN A WEB	:	
PAGE	:	

**APPELLANTS' BRIEF UNDER 37.CFR §41.37**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

This is an appeal to a final rejection dated February 07, 2007 of the claims in the Application. This Appeal Brief is being submitted pursuant to a Notice of Appeal filed on May 03, 2007 in accordance with 37 CFR §41.31.

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BRIEF FOR APPLICANTS - APPELLANTS

(i)

Real Party in Interest

The real party in interest is International Business Machines Corporation (IBM), the assignee.

(ii)

Related Appeals and Interferences

There are no other appeals or interferences known to appellants, appellants' representative or assignee, which will directly affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

(iii)

Status of Claims

Claims 1, 3 – 10, 12, 14 – 21, 23, 25 – 32, 34, 36 – 43 and 45 are pending in the Application and Claims 2, 11, 13, 22, 24, 33, 35, and 44 were canceled. The pending claims have been finally rejected in an Office Action dated February 07, 2007. All the finally-rejected claims are being appealed.

(iv)

Status of Amendment

No amendment was filed subsequent to the final rejection.

(v)

Summary of Claimed Subject Matter

The present invention, as claimed in independent Claim 1, provides a method of making links that are not easily identified in a displayed Web document by a user to be clearly recognizable (page 9, lines 20 – 22). The method comprises the steps of: displaying the Web document (page 10, lines 1 – 4, item 415 of Fig. 4 and page 11, lines 17 and 18), the Web document having a AUS920010875US1

plurality of embedded links (page 10, line 26 to page 11, line 2); enabling the user to issue a command to have the plurality of links embedded in the Web document to be highlighted (page 10, line 9 to page 11, line 9, and item 420 in Fig. 4); receiving the command upon issuance; and upon receiving the command, displaying the Web document with all the plurality of embedded links highlighted (page 10, line 9 to page 11, line 9).

The present invention, as claimed in independent Claim 12, provides a computer program product on a computer readable medium for making links that are not easily identified in a displayed Web document by a user to be clearly recognizable (page 9, lines 20 – 22 and page 9, lines 27 – 29). The computer program product comprises: code means for displaying the Web document (page 10, lines 1 – 4, item 415 of Fig. 4 and page 11, lines 17 and 18), the Web document having a plurality of embedded links (page 10, line 26 to page 11, line 2); code means for enabling the user to issue a command to have the plurality of links embedded in the Web document to be highlighted (page 10, line 9 to page 11, line 9, and item 420 in Fig. 4); code means for receiving the command upon issuance; and code means for displaying the Web document with all the plurality of embedded links highlighted upon receiving the command (page 10, line 9 to page 11, line 9). Note that code means functions are the steps outlined on page 11, line 15 – 30 and in Figs. 6 and 7.

The present invention, as claimed in independent Claim 23, provides an apparatus for making links that are not easily identified in a displayed Web document by a user to be clearly recognizable (page 9, lines 20 – 22). The apparatus comprising: means for displaying the Web document (page 10, lines 1 – 4, item 415 of Fig. 4 and page 11, lines 17 and 18), the Web document having a plurality of embedded links (page 10, line 26 to page 11, line 2); means for enabling the user to issue a command to have the plurality of links embedded in the Web document to be highlighted (page 10, line 9 to page 11, line 9, and item 420 in Fig. 4); means for receiving the user command upon issuance; and means for displaying the Web document with all the plurality of embedded links

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highlighted upon receiving the command (page 10, line 9 to page 11, line 9). Note that the means plus functions are the steps outlined on page 11, line 15 – 30 and in Figs. 6 and 7 when executed by processors 202, 204 of Fig. 2 or 302 of Fig. 3.

The present invention, as claimed in independent Claim 34, provides a computer system (i.e., any of computer systems 104, 108, 110 and 112) for making links that are not easily identified in a displayed Web document by a user to be clearly recognizable (page 9, lines 20 – 22). The computer system comprises: at least one memory device (i.e., local memory 209, hard disk 232 of Fig. 2, main memory 304, disk 326, tape 328, CD-ROM 330 or memory 324 of Fig. 3) for storing code data; and at least one processor (i.e., processors 202, 204 of Fig. 2 or 302 of Fig. 3) for processing the code data for displaying the Web document (page 10, lines 1 – 4, item 415 of Fig. 4 and page 11, lines 17 and 18), the Web document having a plurality of embedded links (page 10, line 26 to page 11, line 2), for enabling the user to issue a command to have the plurality of links embedded in the Web document to be highlighted (page 10, line 9 to page 11, line 9, and item 420 in Fig. 4), for receiving the command upon issuance; and for displaying the Web document with all the plurality of embedded links highlighted upon receiving the command (page 10, line 9 to page 11, line 9).

The present invention, as claimed in independent Claim 45, provides a method of making links that are not easily identified in a displayed Web document by a user to be clearly recognizable (page 9, lines 20 – 22). The method comprises the steps of: displaying the Web document in a browser (page 10, lines 1 – 4, item 415 of Fig. 4 and page 11, lines 17 and 18), the Web document having a plurality of links displayed each in a target area (page 10, line 26 to page 11, line 2); enabling user command to highlight the links by asserting an icon in the browser (page 10, line 9 to page 11, line 9, and item 420 in Fig. 4), the icon being able to toggle on to highlight the links and to toggle off to de-highlight the links (page 11, line 10 – 14 and item 420 in Fig. 5); and enlarging the plurality of links and the target areas upon user command to highlight the

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plurality of the links, the user command including toggling on the icon (page 11, lines 3 – 9).

(vi)

Grounds of Rejection to be Reviewed on Appeal

**Whether Claims 1, 3 – 10, 12, 14 – 21, 23, 25 – 32, 34 and 36 – 43 and 45 were properly rejected under 35 U.S.C. §102(a) as being anticipated by DeStefano**

(vii)

Arguments

**Whether Claims 1, 3 – 10, 12, 14 – 21, 23, 25 – 32, 34, 36 – 43 and 45 were properly rejected under 35 U.S.C. §102(a) as being anticipated by DeStefano**

In considering a Section 102 rejection, all the elements of the claimed invention must be disclosed in a single item of prior art in the form literally defined in the claim. *Jamesbury Corp. v. Litton Indus. Products*, 756 F.2d 1556, 225 USPQ 253 (Fed. Cir. 1985); *Atlas Powder Co. v. Dupont*, 750 F.2d 1569, 224 USPQ 409 (Fed. Cir. 1984); *American Hospital Supply v. Travenol Labs.*, 745 F.2d 1, 223 USPQ 577 (Fed. Cir. 1984).

**Claims 1, 12, 23 and 34**

DeStefano teaches a method of presenting information from a body of knowledge to a user. According to DeStefano, information from a body of knowledge is maintained in one or more information elements, at least a portion of which is associated with one or more named concepts that may be related to one another in any number of logically-relevant ways (e.g., being similar to or different from one another, being members of a common set or group, etc.). Links are defined between two or more of such named concepts so that information elements associated with named concepts linked together may be

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visually represented to a user in such a manner that the logical relationship between such named concepts is apparent to the user.

For example, a reference work on the subject of energy may be categorized as a body of knowledge. A number of named concepts from such a body of knowledge may be defined. For instance, the named concepts may include energy and heat. Within such named concepts, there may be concept identifiers such as "energy", "newton\_energy", "newton\_work", "einstein\_energy", "einstein\_mass", "energy\_sources", "fire", "heat", "energy\_chemical", "energy\_solar", "energy\_geothermal", "gravity", and "cold". Synonym-type links may be defined such that when a user is exploring a certain aspect of the body of knowledge "newton\_energy" and "einstein\_energy" may be displayed as being synonymous to "energy". Likewise, when the user is exploring another aspect of the body of knowledge, synonym-type links may be defined to show that "fire", "energy\_solar" and "energy\_geothermal" are synonymous to "heat".

In such instances (i.e., when the user is exploring a particular aspect of the body of knowledge), the proper links will be activated. Consequently, when the user crosses over one named identifier with a pointer, the other named identifier(s) will be highlighted to show their logical relationship. That is, when the user crosses over named concept identifier "newton\_energy" with a pointer, for instance, named concept identifier "einstein\_energy" will be highlighted, and vice versa, to show that the two terms are synonymous in this particular aspect of the body of knowledge. Likewise, when the user crosses over any one of named concept identifiers "energy\_solar", "energy\_geothermal" and "fire" with the pointer, the named concept identifiers that are not being crossed over with the pointer will be highlighted to show that in the present aspect of the body of knowledge the identifiers are synonymous.

However, DeStefano does not teach the steps of ***enabling a user to issue a command to have a plurality of links embedded in a Web document to be highlighted; and upon receiving the command, displaying the Web***

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***document with all the plurality of embedded links highlighted*** if the links are not easily identified by the user.

Rather, DeStefano teaches that links are highlighted if they are related to a concept represented by a link that is being crossed over by a pointer. And more importantly, only those links that are related to the concept are highlighted as opposed to all links in the document as specified by the present invention.

Consequently, Appellants submit that Claims 1, 12, 23 and 34, along with their dependent claims, are not anticipated by the applied reference.

### **Claims 9, 20, 31 and 42**

Claims 9, 20, 31 and 42 include the limitations of “wherein the plurality of embedded links are duplicated and displayed in a different area to highlight the links.”

DeStefano does not teach duplicating embedded links and displaying the duplicated links in a different area as claimed. Consequently, these claims are not anticipated by DeStefano.

### **Claim 45**

Claim 45 specifically states that an icon is toggled on to highlight the links and toggled off to de-highlight the links and that a user toggles the icon on to highlight the links.

DeStefano does not teach that icon is to be toggled on by a user to highlight the links and off to de-highlight the link. Therefore, as in the case of the other independent claims, the applied reference does not anticipate Claim 45.

Since the applied reference does not teach the limitations of any one of the independent claims, Appellants respectfully request that the rejection be overturned and the case allowed.

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Respectfully Submitted

By:

Volet Emile  
Attorney for Applicants  
Registration No. 39,969  
(512) 306-7969

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(viii)

Claims Appendix

1. (Previously presented) A method of making links that are not easily identified in a displayed Web document by a user to be clearly recognizable comprising the steps of:

displaying the Web document, the Web document having a plurality of embedded links;

enabling the user to issue a command to have the plurality of links embedded in the Web document to be highlighted;

receiving the command upon issuance; and

upon receiving the command, displaying the Web document with all the plurality of embedded links highlighted.

2. Canceled.
3. (Previously presented) The method of Claim 1 wherein the plurality of embedded links flash to highlight the links.
4. (Previously presented) The method of Claim 1 wherein the plurality of embedded links are displayed in a different color to highlight the links.
5. (Previously presented) The method of Claim 1 wherein the plurality of embedded links are displayed using a larger font to highlight the links.

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6. (Previously presented) The method of Claim 1 wherein the plurality of embedded links are displayed using a different font to highlight the links.
7. (Previously presented) The method of Claim 1 wherein the plurality of embedded links are emboldened to highlight the links.
8. (Previously presented) The method of Claim 1 wherein the plurality of embedded links are displayed using an enlarged font and the links target area enlarged to highlight the links.
9. (Previously presented) The method of Claim 1 wherein the plurality of embedded links are duplicated and displayed in a different area to highlight the links.
10. (Original) The method of Claim 9 wherein when a duplicated link is selected, its corresponding link in the Web document flashes or is emboldened or is displayed in a different color or is displayed using a different font or a larger font.
11. Canceled.
12. (Previously presented) A computer program product on a computer readable medium for making links that are not easily identified in a displayed Web document by a user to be clearly recognizable comprising:
  - code means for displaying the Web document, the Web document having a plurality of embedded links;
  - code means for enabling the user to issue a command to have the plurality of links embedded in the Web document to be highlighted;

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- code means for receiving the command upon issuance; and
- code means for displaying the Web document with all the plurality of embedded links highlighted upon receiving the command.
13. Canceled.
14. (Previously presented) The computer program product of Claim 12 wherein the plurality of embedded links flash to highlight the links.
15. (Previously presented) The computer program product of Claim 12 wherein the plurality of embedded links are displayed in a different color to highlight the links.
16. (Previously presented) The computer program product of Claim 12 wherein the plurality of embedded links are displayed using a larger font to highlight the links.
17. (Previously presented) The computer program product of Claim 12 wherein the plurality of embedded links are displayed using a different font to highlight the links.
18. (Previously presented) The computer program product of Claim 12 wherein the plurality of embedded links are emboldened to highlight the links.
19. (Previously presented) The computer program product of Claim 12 wherein the plurality of embedded links are displayed using an enlarged font and the links' target area enlarged to highlight the links.

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20. (Previously presented) The computer program product of Claim 12 wherein the plurality of embedded links are duplicated and displayed in a different area to highlight the links.
21. (Original) The computer program product of Claim 20 wherein when a duplicated link is selected, its corresponding link in the Web document flashes or is emboldened or is displayed in a different color or is displayed using a different font or a larger font.
22. Canceled.
23. (Previously presented) An apparatus for making links that are not easily identified in a displayed Web document by a user to be clearly recognizable comprising:
  - means for displaying the Web document, the Web document having a plurality of embedded links;
  - means for enabling the user to issue a command to have the plurality of links embedded in the Web document to be highlighted;
  - means for receiving the user command upon issuance; and
  - means for displaying the Web document with all the plurality of embedded links highlighted upon receiving the command.
24. Canceled.

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25. (Previously presented) The apparatus of Claim 23 wherein the plurality of embedded links flash to highlight the links.
26. (Previously presented) The apparatus of Claim 23 wherein the plurality of embedded links are displayed in a different color to highlight the links.
27. (Previously presented) The apparatus of Claim 23 wherein the plurality of embedded links are displayed using a larger font to highlight the links.
28. (Previously presented) The apparatus of Claim 23 wherein the plurality of embedded links are displayed using a different font to highlight the links.
29. (Previously presented) The apparatus of Claim 23 wherein the plurality of embedded links are emboldened to highlight the links.
30. (Previously presented) The apparatus of Claim 23 wherein the plurality of embedded links are displayed using an enlarged font and the links target area enlarged to highlight the links.
31. (Previously presented) The apparatus of Claim 23 wherein the plurality of embedded links are duplicated and displayed in a different area to highlight the links.
32. (Original) The apparatus of Claim 31 wherein when a duplicated link is selected, its corresponding link in the Web document flashes or is emboldened or is displayed in a different color or is displayed using a different font or a larger font.
33. Canceled.

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34. (Previously presented) A computer system for making links that are not easily identified in a displayed Web document by a user to be clearly recognizable comprising:
  - at least one memory device for storing code data; and
  - at least one processor for processing the code data for displaying the Web document, the Web document having a plurality of embedded links, for enabling the user to issue a command to have the plurality of links embedded in the Web document to be highlighted, for receiving the command upon issuance; and for displaying the Web document with all the plurality of embedded links highlighted upon receiving the command.
35. Canceled.
36. (Previously presented) The computer system of Claim 34 wherein the plurality of embedded links flash to highlight the links.
37. (Previously presented) The computer system of Claim 34 wherein the plurality of embedded links are displayed in a different color to highlight the links.
38. (Previously presented) The computer system of Claim 34 wherein the plurality of embedded links are displayed using a larger font to highlight the links.
39. (Previously presented) The computer system of Claim 34 wherein the plurality of embedded links are displayed using a different font to highlight the links.

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40. (Previously presented) The computer system of Claim 34 wherein the plurality of embedded links are emboldened to highlight the links.
41. (Previously presented) The computer system of Claim 34 wherein the plurality of embedded links are displayed using an enlarged font and the links target area enlarged to highlight the links.
42. (Previously presented) The computer system of Claim 34 wherein the plurality of embedded links are duplicated and displayed in a different area to highlight the links.
43. (Original) The computer system of Claim 42 wherein when a duplicated link is selected, its corresponding link in the Web document flashes or is emboldened or is displayed in a different color or is displayed using a different font or a larger font.
44. Canceled.
45. (Previously presented) A method of making links that are not easily identified in a displayed Web document by a user to be clearly recognizable comprising the steps of:

displaying the Web document in a browser, the Web document having a plurality of links displayed each in a target area;

enabling user command to highlight the links by asserting an icon in the browser, the icon being able to toggle on to highlight the links and to toggle off to de-highlight the links; and

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enlarging the plurality of links and the target areas upon user command to highlight the plurality of the links, the user command including toggling on the icon.

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(ix)  
Evidence Appendix

None.

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(x)  
Related Proceedings Appendix

None.

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